

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	CASE NO: 3:07-cr-80-WHA
)	
ALEXIS RAMON HERRERA-FLORES)	

UNOPPOSED MOTION FOR TREATMENT

Comes now the Defendant, by counsel and pursuant to 18 U.S.C. 4241(d), and respectfully moves this Court to waive or continue a hearing on competency of the Defendant to stand trial; to enter an order finding the Defendant incompetent at this time; and to direct that the Defendant be immediately returned to the custody of the U.S. Bureau of Prisons for appropriate treatment.

This Motion is supported by the following grounds:

1. The parties agree that experts employed by the U.S. Bureau of Prisons have found the Defendant to be suffering from a mental illness which renders him incompetent to be tried at the present time.
2. The experts employed by the U.S. Bureau of Prisons have opined that the Defendant's mental illness is treatable.
3. The Defendant is presently at the Montgomery City Jail and, on information and belief, is receiving no treatment relating to his mental illness.
4. Neither party opposes the return of the Defendant to the custody of the U.S. Bureau of Prisons for appropriate treatment.

5. Government counsel does not oppose this motion.

WHEREFORE, Defendant requests that this motion be granted.

Respectfully submitted,

s/Christine A. Freeman

CHRISTINE A. FREEMAN

TN BAR NO.: 11892

Attorney for Alexis Ramon Herrera-Flores

Federal Defenders

Middle District of Alabama

201 Monroe Street , Suite 407

Montgomery, AL 36104

TEL: (334) 834-2099

FAX: (334) 834-0353

E-Mail: Christine_Freeman@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Nathan D. Stump, Esquire, Assistant United States Attorney, One Court Square, Suite 201, Montgomery, Alabama 36104.

s/Christine A. Freeman

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